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Mr. Fethi Benjemaa
California Department of Water Resources
Water Use Efficiency Branch
SBX7-7 Program
P.O. Box 94236-001

Subject: Comments on November 15, 2011 Draft Report to Legislature Quantifying the Efficiency of Agricultural Water Use

Dear Mr. Benjemaa:

The legislative directive for the preparation of said report to the legislature quantifying the efficiency of agricultural water use comes from Section 10608.64 of the 2009 SB X7-7 legislation which states,

> *The department, in consultation with the Agricultural Water Management Council, academic experts, and other stakeholders, shall develop a methodology for quantifying the efficiency of agricultural water use. Alternatives to be assessed shall include, but not be limited to, determination of efficiency levels based on crop type or irrigation system distribution uniformity. On or before December 31, 2011, the department shall report to the Legislature on a proposed methodology and a plan for implementation. The plan shall include the estimated implementation costs and the types of data needed to support the methodology. Nothing in this section authorizes the department to implement a methodology established pursuant to this section.*

Reading through the report I continue to ask the question, "What is its purpose?" The intent as presented at ASC meetings was to provide the Legislature with a report with a detailed description of the many factors related to water use application and efficiency and include information on different methods which could possibly be used to quantify agricultural water use efficiency, but the emphasis was not to tell the Legislature how to do it. I believe this is a mistake. The current draft report does not yet include the required information on estimated implementation costs yet the report currently has 45 pages of information, examples and proposed methodologies responding to and

attempting to address the five (5) sentences in the legislation. Yet it does not provide a specific recommendation on what would be a reasonable, practical, and cost effective methodology to quantify the efficiency of agricultural water use. This should be provided in the report. The legislation did say the report was to "... develop a methodology." It doesn't say several different methodologies.

If, as many anticipate, the legislature determines there is a need to implement some type of process to quantify the efficiency of agricultural water use in the future, how will they proceed? Several methodologies are presented, but a recommended summary of the most reasonable and cost effective methodology is not presented. When a large project of any type is proposed, the CEQA process requires a detailed analysis and review of all potential environmental issues which may develop or occur because of the proposed project. Modifications to a project are developed or implemented to minimize impacts and in many cases to mitigate potential impacts. In the end the Lead Agency recommends a proposed project for approval. Most legislators are not familiar with agricultural water use. I am concerned the report will overwhelm most legislators. If all they have is a list of several different potential methodologies they will not have a clear understanding on what should be implemented and there will be great uncertainty on what any future legislation could or should include. I strongly recommend a specific recommendation be included in the report.

The revised report added some descriptions of data limitations describing the assumptions and difficulties of implementing any of the methodologies currently proposed. It is recommended these assumptions be clearly presented in a subsection titled "Data Limitations" under each methodology. Regarding the Economic Productivity Methodology outlined in Section 4, I do not believe this is a reasonable or useful methodology for implementation. Yet, if it is included, a strong emphasis needs to be made in the introductory sections that this data, though it may provide some interesting information, will be a technical challenge to use as a water use efficiency methodology, and it really does not indicate or measure the actual efficiency of agricultural water use.

As mentioned in an earlier letter, I am still hopeful the final methodology developed can be simple and straight forward taking into account the difficulty, assumptions and estimates which will be needed to reasonably calculate or quantify the efficiency of California's agricultural water use.

Very truly yours,

Roger L. Reynolds